

Hearing Date: February 17, 2011 at 10:00 am ET
Response Deadline: February 3, 2011 at 4:00 pm ET

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Attorneys for Ex-Cell-O Machine Tools, Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

/

In re:

DELPHI CORPORATION, *et al.*,

Debtor.

Chapter 11
Case No. 05-44481-RDD
Jointly Administered

/

**EX-CELL-O MACHINE TOOLS, INC.'S JOINDER IN ATS AUTOMATION
TOOLING SYSTEMS INC.'S MOTION AND BRIEF OF DEFENDANT FOR
RELIEF FROM FOURTH ORDER EXTENDING TIME TO SERVE COMPLAINT**

Defendant Ex-Cell-O Machine Tools, Inc. ("Ex-Cell-O"), through its attorneys, Wolfson Bolton PLLC, and for its Joinder in ATS Automation Tooling Systems Inc.'s Motion and Brief of Defendant for Relief from Fourth Order Extending Time to Serve Complaint states as follows:

Because the arguments raised by Defendant ATS Automation Tooling Systems Inc. apply with equal force to Ex-Cell-O,¹ and to avoid submitting multiple, substantially similar reply briefs to the Court, Ex-Cell-O hereby expressly joins and incorporates by reference the arguments set forth in Defendant ATS Automation Tooling Systems Inc.'s

¹ Ex-Cell-O is a preference defendant in case no. 07-02337.

Motion and Brief of Defendant for Relief from Fourth Order Extending Time to Serve
Complaint [Docket No. 20699].

WHEREFORE, Ex-Cell-O respectfully requests that this Court (I) vacate the
Fourth Order Extending Time To Serve Complaint [Docket No. 18999]; (II) dismiss the
Complaint with prejudice; (III) award Ex-Cell-O its fees and costs incurred in connection
with the Complaint; and (IV) grant such other relief as the Court deems just and proper.

Respectfully submitted,

WOLFSON BOLTON PLLC
Attorneys for Ex-Cell-O

Dated: October 22, 2010

By: /s/ Anthony J. Kochis
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CERTIFICATE OF SERVICE

I certify that on October 22, 2010, I caused Ex-Cell-O Machine Tools, Inc.'s Joinder in ATS Automation Tooling Systems Inc.'s Motion and Brief of Defendant for Relief from Fourth Order Extending Time to Serve Complaint to be electronically filed with the Clerk of the Court using the ECF system, which sent notification of such filing to all ECF participants requesting electronic service.

The following parties were also served by U.S. First Class Mail on October 22, 2010:

Hon. Robert D. Drain U.S. Bankruptcy Court Southern District of New York White Plains Office 300 Quarropas Street White Plains, NY 10601	Daniel F.X. Geoghan, Esq. Togut, Segal & Segal LLP One Penn Plaza Suite 3335 New York, NY 10119
Eric B. Fisher, Esq. Butzel Long 380 Madison Avenue 22 nd Floor New York, NY 10017	Office of United States Trustee Attn: Alicia M. Leonhard, Trace Hope Davis and Brian Masumoto 33 Whitehall St. 21 st Floor New York, NY 10004

Dated: October 22, 2010

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